REMARKS

Claims 1, 7-11, and 17-26 are pending in the application. Claims 1, 7-11, and 17-20 are amended. Claims 2-6 and 12-16 are canceled. Claims 21-26 are added. The amendments to the claims as indicated herein do not add any new matter to this application.

PRIORITY

The claim of priority is canceled by the amendment to paragraph [0001].

OBJECTIONS TO THE CLAIMS

Claims 9 and 10 have been amended. The Applicants respectfully submit that the amendments to these claims eliminate any informalities that were present in these claims.

CLAIM REJECTIONS—35 U.S.C. § 101

Claims 1-20 were rejected under 35 U.S.C. § 101. Claims 2-6 and 12-16 have been canceled.

Claim 1 has been amended to recite, additionally, "storing said list of candidate alternative spellings on a computer-readable storage medium." The Applicants respectfully submit that the amendments to Claim 1 remedy any deficiencies from which Claims 1 and 7-10 might have suffered under 35 U.S.C. § 101.

Claims 11 and 17-20 have been amended to recite a "volatile or non-volatile computer-readable storage medium" rather than just a "computer-readable medium." The Applicants respectfully submit that the amendments to Claims 11 and 17-20 remedy any deficiencies from which these claims might have suffered under 35 U.S.C. § 101.

CLAIM REJECTIONS—35 U.S.C. § 112, FIRST PARAGRAPH

Claims 2-6 were rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. The Applicants note that the claims as filed are considered to be a part of the specification. Nevertheless, Claims 2-6 have been canceled, thereby obviating the rejections of those claims.

CLAIM REJECTIONS—35 U.S.C. § 112, SECOND PARAGRAPH

Claim 8 was rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. Claim 8 has been amended to clarify that the "frequencies of occurrences" pertain to the "plurality of files." The Applicants respectfully submit that the amendments to Claim 8 remedy any deficiencies from which Claim 8 might have suffered under 35 U.S.C. § 112, second paragraph.

CLAIM REJECTIONS—35 U.S.C. § 102

Claims 1, 2, 7, 8, 11, 12, 17, and 18 were rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 7,146,358 ("Gravano"). Claims 2 and 12 have been canceled. The rejections of Claims 1, 7, 8, 11, 17, and 18 are respectfully traversed for at least the reasons discussed below.

As amended, Claim 1 recites features including "searching, within said second file, for **any** spellings that satisfy particular criteria; wherein said particular criteria includes that said spellings are spelled similarly to, but not exactly the same as, said first spelling;" and "adding, to a list of candidate alternative spellings of said first spelling, all spellings within the second document that satisfy the particular criteria." Thus, according to the method of Claim 1, **any**

spellings that are (a) in the second document and (b) spelled similarly to, but not exactly the same as, the first spelling, are **searched for**. Also, according to the method of Claim 1, **all** such spellings are added to the list of candidate alternative spellings.

Gravano's approach does not involve such features. In Gravano, a query translation engine uses a dictionary to identify potential translations. The query translation engine uses text from the linked-to documents to disambiguate among these translations. Thus, Gravano's search engine can translate the entered query **only** into one of the translations that already exists in the dictionary. Gravano's approach does not search for **any** translations that exist in the linked-to documents—only those that are already in the dictionary. If the linked-to documents contain translations that are **not** in the dictionary, then Gravano's approach will **not** translate the original query using those translations. Thus, under Gravano's approach, less than **all** of the translations in the linked-to documents will be considered for the translation process. Thus, Gravano differs from Claim 1 in at least these aspects. Indeed, without the dictionary, it is unclear how Gravano's approach could even identify translations in the linked-to documents, since there is no guarantee that the translations of the query terms will be even remotely similar in spelling to the original query terms.

Additionally, Gravano's approach searches for translations on a basis that has **nothing to do** with whether or not those translations are spelled similarly to the original query terms. The translations that Gravano's approach uses to translate the query terms may be spelled in a manner such that there is absolutely **no similarity** in spelling between the original query terms and the translations used. Indeed, if Gravano's approach **did** search the linked-to documents for all words that were spelled similarly to the original query terms, then Gravano's approach would likely produce translations that were not correct, since many words in one language are spelled

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similarly to words in other languages that have entirely different meanings and therefore make poor translations (e.g., while "embarazada" looks like "embarrassed," it actually means "pregnant"). Gravano's approach has nothing to do with searching for words that are spelled similarly to, but not exactly the same as, spellings that were submitted by a user. Similarity in spelling is not the basis by which Gravano selects words from the linked-to documents. Gravano's approach seeks to translate query terms into a different language regardless of spelling, **not** to determine alternative spellings for those query terms.

Furthermore, at a practical level, these differences are very significant. For example, if a person named Blonkovichizni suddenly became a popular topic of discussion, then searches would probably pick up documents with incorrect spellings that are linked to documents that have the correct spelling. In contrast, it is highly unlikely that any dictionary would happen to have any entries for Blonkovichizni.

Thus, Gravano does not disclose "searching, within said second file, for **any** spellings that satisfy particular criteria; wherein said particular criteria includes that said spellings are spelled similarly to, but not exactly the same as, said first spelling;" and "adding, to a list of candidate alternative spellings of said first spelling, **all** spellings within the second document that satisfy the particular criteria" as recited in Claim 1. For at least the above reasons, the Applicants respectfully submit that Claim 1 is patentable over Gravano under 35 U.S.C. § 102(e).

By virtue of their dependence from Claim 1, Claims 7 and 8 inherit the patentable features of Claim 1 discussed above. Therefore, for at least the reasons discussed above in connection with Claim 1, the Applicants respectfully submit that Claims 7 and 8 are also patentable over Gravano under 35 U.S.C. § 102(e).

Claims 11, 17, and 18 are computer-readable medium analogues to the methods recited in Claims 1, 7, and 8, respectively. Therefore, for at least the reasons discussed above in connection with Claims 1, 7, and 8, the Applicants respectfully submit that Claims 11, 17, and 18 are also patentable over Gravano under 35 U.S.C. § 102(e).

CLAIM REJECTIONS—35 U.S.C. § 103

Claims 3-6, 9, 10, 13-16, 19, and 20 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Gravano in view of various other references. Claims 3-6 and 13-16 have been canceled. The rejections of Claims 9, 10, 19, and 20 are respectfully traversed for at least the reasons discussed below.

By virtue of their dependence from Claim 1, Claims 9 and 10 inherit the features that Gravano fails to disclose, as discussed above. The other cited references also do not disclose, and, indeed, are not even alleged to disclose, these features. Consequently, even if Gravano and all of the other cited references could be combined, the combination still would not teach, disclose, or suggest these features that Claims 9 and 10 inherit from Claim 1. For at least these reasons, the Applicants respectfully submit that Claims 9 and 10 are patentable over Gravano and the other cited references, considered either individually or in combination, under 35 U.S.C. § 103(a).

Claims 19 and 20 are computer-readable medium analogues to the methods recited in Claims 9 and 10, respectively. Therefore, for at least the reasons discussed above in connection with Claims 9 and 10, the Applicants respectfully submit that Claims 19 and 20 are also patentable over Gravano and the other cited references, considered either individually or in combination, under 35 U.S.C. § 103(a).

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

Hickman Palermo Truong & Becker LLP

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/ChristianANicholes#50,266/
Christian A. Nicholes
Reg. No. 50,266

2055 Gateway Place, Suite 550
San Jose, California 95110-1089
Telephone No.: (408) 414-1080
Facsimile No.: (408) 414-1076

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